

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION**

**MDL 2724
16-MD-2724**

THIS DOCUMENT RELATES TO:

**HON. CYNTHIA M. RUFÉ
Individual Case No. 20-6557**

*United HealthCare Services, Inc. v. Sandoz,
Inc., et al.*

ORDER

AND NOW, this 1st day of April 2021, upon consideration of the attached Joint Stipulation for Filing of Unredacted Version of United HealthCare Services, Inc.'s December 15, 2020 Complaint in the above-referenced action, it is hereby **ORDERED** that the Stipulation is **APPROVED**.

It is so **ORDERED**.

BY THE COURT:

/s/ Cynthia M. Rufe

CYNTHIA M. RUFÉ, J

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION

MDL 2724
16-MD-2724

THIS DOCUMENT RELATES TO:

HON. CYNTHIA M. RUFE

United HealthCare Services, Inc. v. Sandoz, Inc. et al., Case No. 2:20-cv-06557-CMR

**JOINT STIPULATION FOR FILING OF UNREDACTED VERSION OF
UNITED HEALTHCARE SERVICES, INC.'S DECEMBER 15, 2020 COMPLAINT**

WHEREAS, Plaintiff United HealthCare Services, Inc. (“United”) filed a Complaint on December 15, 2020, in *United HealthCare Services, Inc. v. Sandoz, Inc.* (“United’s December 15, 2020 Complaint”), Case No. 0:20-cv-02543 (D. Minn.), which was transferred by the United States Judicial Panel on Multidistrict Litigation on December 30, 2020 to the Eastern District of Pennsylvania, assigned Civil Action No. 2:20-cv-06557-CMR, and centralized for pretrial proceedings as part of *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, Case No. 16-md-2724-CMR, MDL No. 2724;

WHEREAS, United’s December 15, 2020 Complaint was filed in redacted form, including to protect some of the same information redacted from the Plaintiff States’ June 10, 2020 Complaint in *State of Connecticut et al. v. Sandoz, Inc. et al.* (the “Plaintiff States’ June 10, 2020 Complaint”), Civil Action No. 2:20-cv-03539-CMR;

WHEREAS, United informed the Court and the parties that it would file the unredacted version of its December 15, 2020 Complaint pursuant to the applicable MDL protective orders and procedures following the completion of the transfer of the action to this Court;

WHEREAS, on January 14, 2021, the Court entered an Order granting the Plaintiff States' unopposed Motion to Unseal Redacted Information in the Plaintiff States' June 10, 2020 Complaint (MDL Doc. No. 1652), and on January 27, 2021 the Clerk of the Court accordingly unsealed and placed on the public docket the full and unredacted version of the Plaintiff States' June 10, 2020 Complaint (Doc. No. 2 in Civil Action No. 20-3539);

WHEREAS, the parties have met and conferred concerning the additional redacted information (beyond that in the States' June 10, 2020 Complaint) contained in United's December 15, 2020 Complaint that should remain redacted from public view pursuant to the Protective Orders entered in these proceedings; and

WHEREAS, in light of the above, the Defendants to the action (Sandoz Inc.; Actavis Holdco US, Inc.; Actavis Elizabeth LLC; Actavis Pharma, Inc.; Amneal Pharmaceuticals, Inc.; Amneal Pharmaceuticals LLC; Aurobindo Pharma U.S.A., Inc.; Bausch Health Americas, Inc.; Bausch Health US, LLC; Fougera Pharmaceuticals Inc.; Glenmark Pharmaceuticals Inc., USA; G&W Laboratories, Inc.; Lannett Company, Inc.; Lupin Pharmaceuticals, Inc.; Mylan Inc.; Mylan Pharmaceuticals Inc.; Mylan N.V.; Perrigo New York, Inc.; Sun Pharmaceutical Industries, Inc.; Taro Pharmaceuticals U.S.A., Inc.; Teligent, Inc.; and Wockhardt USA LLC) (collectively, "Defendants") agree that United should be permitted to file new public and sealed versions of its December 15, 2020 Complaint in its respective action, only redacting and sealing select information as substantially narrowed by the parties.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, as follows:

1. Within 14 days of approval by the Court of this Stipulation, United shall:

- a. file via ECF a new public version of its December 15, 2020 Complaint in Civil Action No. 2:20-cv-06557-CMR that un-redacts all previously redacted information except for select personal identification information contained at paragraphs 1282-1284 and 1287-1288; and
- b. file under seal a sealed version of its December 15, 2020 Complaint, indicating in gray transparent highlighting the information in paragraphs 1282-1284 and 1287-1288 that remains redacted in the public version.

2. The versions of United's December 15, 2020 Complaint to be filed pursuant to this Stipulation shall not be considered to be amendments to the complaint for any purpose, including under the Federal Rules of Civil Procedure and the Court's Pretrial Orders.

IT IS SO STIPULATED.

Dated: March 31, 2021

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